

April 20, 2000

Office of Special Nutritionals (HFS-450) Center for Food Safety and Applied Nutrition Food and Drug Administration 200 C Street SW Washington, DC 20204

Dear Food and Drug Administration,

Herbalist & Alchemist, Inc., manufacturer, located at 51 South Wandling Ave., Washington, NJ 07882 is marketing the following product:

Phytodent

containing: witch hazel

spilanthes

myrrh

goldenseal

peppermint essential oil

bloodroot

cinnamon essential oil

bearing a structure/function claim of: Promotes Healthy Gums We have substantiation to support this claim.

Sincerely,

Elizabeth D. Bancroft

109h

51 South Wandling Ave. Washington, NJ 07882